

Hon. Ricardo S. Martinez

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

SANDRA L. FERGUSON,

Judgment Debtor,

vs.

BRIAN J. WAID and the WAID
MARITAL COMMUNITY,

Judgment Creditor

CASE NO. 17-cv-01685-RSM

REPLY IN SUPPORT OF
MOTION FOR CONTEMPT

[No Opposition]

NOTE ON MOTION
CALENDAR: April 4, 2025

MAY IT PLEASE THE COURT:

Ms. Ferguson has harassed me since 2012. We had a trial over her false allegations in 2018, at great cost to me. Following trial, the Court found against Ms. Ferguson and the Ninth Circuit affirmed that decision on appeal. I filed this motion because I am now 75 years old and a cancer survivor, and I do not want Ms. Ferguson's defamatory lies (whether to date or in the future) to survive uncontroverted in the eternal Court Record.

Waid Reply Declaration in Support of
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I thus ask the Court to fashion remedies that will put an end to Ms. Ferguson's harassment, once and for all time.

Ms. Ferguson indisputably received the motion for contempt. Waid Decl. (04/01/25) ¶¶1-2. Her response to the motion was due on Monday, March 31, 2025. She did not file a response. As provided by LCR 7(b)(2), Ms. Ferguson's failure to file an opposition "may be considered by the court as an admission that the motion has merit."

Ms. Ferguson has nevertheless continued to demonstrate the willfulness of her contempt, even after having been served with the motion for contempt. More specifically, on March 27, 2025, Ms. Ferguson filed a pleading in her King County Superior Court lawsuit against the Washington State Bar Association entitled "Notice of Endangerment and Corruption: Supporting Declaration of Sandra L. Ferguson" in which she stated, among other false assertions [Waid Decl. (04/01/25) **Ex. E**]:

pg	¶	<u>False Assertion of Fact</u>
• 1-2	4	conversion of funds
• 4	12	corrupt lawyer
• 5-6	19	insurance fraud
• 8	27	did not pay Bilanko
• 9	33	serial fraudster

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- 1 low level foot soldier in criminal enterprise
 2 • 10 34 fraud

3 A few days later, Ms. Ferguson filed an “amended” version of her
 4 “Notice of Endangerment” in which she again asserted additional facts,
 5 under penalty of perjury, which are patently false and in further contempt
 6 of this Court’s injunction, including [*id.* Ex. F]:
 7

8
 9 pg. ¶ False Assertion of Fact

- 10 • 8 29 breached fiduciary duty; incorrectly advised me; filed
 11 unnecessary lawsuit
 12 • 9 29 committed fraud
 13 • 9 30 breached fiduciary duty
 14 • 11 40 criminal enterprise

15 The Court should therefore grant the motion for contempt and
 16 impose appropriate remedies to punish Ms. Ferguson’s contempt and
 17 discourage her from future contemptuous conduct.¹

18 **LCR 7(e)(4) Certification:** I hereby certify that this Reply
 19 contains 388 words, which is less than the word limit applicable to this
 20 Reply.
 21

22
 23 ¹ Ms. Ferguson’s “Notice of Endangerment” and “Amended Notice of Endangerment”
 24 make numerous, additional, false assertions of fact, under penalty of perjury. Waid
 25 Decl. (04/01/2025) ¶3.

1 DATED: April 1, 2025.

2 WAID LAW OFFICE, PLLC

3
4 BY: /s/ Brian J. Waid
5 BRIAN J. WAID
6 WSBA No. 26038
7 *Pro Se* Judgment Creditor

8 **CERTIFICATE OF SERVICE**

9 I hereby certify that I emailed a copy of this Reply to all counsel
10 and/or parties of record on the 1st day of April 2025 via the Court's ECF
11 delivery system and/or email.

12 DATED: April 1, 2025.

13 WAID LAW OFFICE, PLLC

14
15 BY; /s/ Brian J. Waid
16 BRIAN J. WAID
17 WSBA No. 26038
18 *Pro se* Judgment Creditor

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25 Waid Reply Declaration in Support of
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